

**FACT SHEET**  
**GENERAL PERMIT NO. LAG480000**  
**AI 84683**  
**GEN20060001**

**DISCHARGES FROM LIGHT COMMERCIAL FACILITIES**

FACT SHEET FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (LPDES) REISSUANCE PERMIT FOR DISCHARGES FROM LIGHT COMMERCIAL FACILITIES TO WATERS OF THE STATE.

Permit No.	LAG480000
Issuing Office:	State of Louisiana Department of Environmental Quality Office of Environmental Services Water and Waste Permits Division Municipal and General Water Permits Section
Prepared By: (LAC 33:IX.3111.B.7)	Linda Gauthier Municipal and General Water Permits Section (225) 219-0801
Permit Action:	Reissuance of a General Permit for Discharges from Light Commercial Facilities
Date Prepared	July 28, 2005, revised December 20, 2005; February 13, 2006

**I. COVERED ACTIVITY (LAC 33:IX.3111.B.1,2)**

This LPDES permit is being reissued and will replace the current LPDES General Permit for Discharges from Light Commercial Facilities (LAG480000), which was issued by the Louisiana Department of Environmental Quality (LDEQ) on July 31, 2001 and effective August 1, 2001. The availability of an LPDES general permit for discharges from light commercial facilities streamlines the permit process for minor facilities that generate *common types of incidental, low-potential wastewaters, which allows the Department to devote more resources to issuing individual LPDES permits to industrial facilities with discharges that require more regulatory oversight.*

The reissued permit shall cover discharges of incidental, low-potential wastewaters from activities and operations which commonly occur at a variety of minor industrial facilities operating within the state including, but not limited to, general merchandise stores; aircraft

service facilities; boat and barge repair operations; bulk cement terminals; docks; engine sales, service and/or repair operations; machinery and equipment manufacturing and rental facilities; small manufacturing and distribution facilities; fabrication shops; foundries; machine shops; equipment rental facilities; engine repair operations; oil field service/support operations; refined petroleum pipeline booster stations; railroad classification and service yards; ports and transportation terminals; military vehicle outfitting and storage facilities; and equipment and vehicle maintenance and storage facilities. Authorization to discharge under this general permit will be available to eligible facilities that generate any of the following types of wastewater or storm water:

- 1) discharges of less than 25,000 GPD of treated sanitary wastewater;
- 2) discharges of wastewater from a washrack(s) used to wash the exterior of vehicles and/or equipment;
- 3) discharges of washdown wastewater from equipment repair areas;
- 4) discharges of wastewater from washing down shop floors;
- 5) discharges of wastewater from the washing of docks;
- 6) discharges of utility wash water;
- 7) discharges of hydrostatic testing and vessel testing wastewater from the testing of pipes, vessels, and/or tanks which are new, or which have been used for the transport, transfer, or storage of natural gas, crude oil, or liquid or gaseous petroleum hydrocarbons;
- 8) discharges of non-contact cooling water (less than 100,000 GPD flow) where the 126 priority pollutants are not components of the water additives;
- 9) discharges of cooling tower blowdown (less than 25,000 GPD flow) where the 126 priority pollutants are not components of the water additives;
- 10) discharges of boiler blowdown and boiler treatment blowdown where the 126 priority pollutants are not components of the water additives;
- 11) discharges of condensate which does not come into contact with products, raw materials, or waste materials;
- 12) regulated industrial storm water (see Permit Part II.A.36), and
- 13) discharges of any combination of the above wastewaters.

Site-specific coverage under this general permit may be available to any minor industrial facility that operates a source or conducts an activity regulated by this LPDES permit.

## II. OBTAINING COVERAGE

Proposed facilities desiring coverage under this permit must submit an NOI at least sixty (60) days prior to commencement of discharge. Several different NOI forms will be accepted for coverage under this general permit. The LCF-G form is the form most commonly submitted for permit coverage. Other approved forms are the WPC-3 for Barge Cleaning and/or Repair Facilities; the NGF-3 for Natural Gas Compressor Stations and related facilities engaged in the transmission, distribution and/or storage of natural gas; the NGF-3 for Natural Gas Fractionation and/or Sweetening Facilities; and the OSC-2 form for Oil Field Service Companies. Dischargers desiring coverage under this general permit must submit one of the approved NOI forms, all of which may be obtained by contacting the Water and Waste Permits Division at (225) 219-3294, or from the LDEQ web site at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/index.htm>.

Existing facilities conducting activities that result in discharges eligible for coverage under this permit but are not permitted by an LPDES permit should submit an NOI immediately.

Any permittee covered by an individual permit or other general permit(s) may submit an NOI and request that the individual permit or other general permit(s) be canceled if the permitted source or activity is also eligible for coverage under this general permit. Upon approval by this Office, the permittee will be concurrently notified of coverage by this general permit and of cancellation of the previous permit(s) except in the case of permittees with separate authorization under the Multi-Sector General Permit (MSGP) for storm water discharges from a facility.

A facility whose storm water discharges are currently authorized under an MSGP LAR05XXXX permit number and are later authorized under the facility's Light Commercial General Permit number should request that the MSGP LAR05XXXX permit number be terminated after the facility receives a Light Commercial Facilities General Permit number (LAR48XXXX) which authorizes both wastewater and storm water discharges from the facility. The facility's previously issued MSGP LAR05XXXX permit authorization number will be terminated by the Water and Waste Permits Division upon receipt of the correctly completed MSGP Notice of Termination (MSGP-NOT) form. The MSGP-NOT form is available on the LDEQ website at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/msgp-not.doc>.

Dischargers who are currently permitted under the LPDES version of this permit that expires on July 31, 2006, are not required to submit a new NOI. These permitted dischargers will be automatically covered under the reissued LPDES permit; notification of coverage and a copy of the permit will be sent to each permittee after permit finalization. Permit conditions in the reissued permit are effective for these automatically-authorized permittees three (3) days after the postmark date of the notification of the facility's coverage under the reissued general permit.

III. DISCHARGE DESCRIPTION (LAC 33:IX.3111.B.2)

The general permit will authorize only discharges identified above in Part I, items 1-13, which typically are short-term discharges of low volume flows. This permit **shall not** apply to:

1. discharges from facilities classed as "Majors" in the LPDES permitting system,
2. discharges other than those listed above (items 1 through 13),
3. discharges listed above (items 1 - 13) that are mixed with other, non-covered discharge types unless those other discharges are in compliance with another LPDES permit,
4. discharges, or the potential for discharge, of substances that are not addressed by or would not be adequately regulated by this permit, including any of the Organic Toxic Pollutants, Other Toxic Pollutants (Metals and Cyanide) and Total Phenols, and Toxic Pollutants and Hazardous Substances listed in Tables II, III, and V of LAC 33:IX Appendix D, except as specifically limited in Part I, Schedule D of the permit for discharges of hydrostatic testing and vessel testing wastewaters,
5. discharges of wastewaters which have limits assigned to them in the Louisiana Water Quality Management Plan or an approved Waste Load Allocation which are different from the limits contained in this permit,
6. discharges which are likely to have unauthorized adverse effects upon threatened or endangered species, or on the critical habitat for these species as determined in conjunction with the U.S. Fish and Wildlife Service (USFWS);
7. discharges which adversely affect properties listed or eligible for listing in the National Register of Historic Places, unless they are in compliance with requirements of the National Historic Preservation Act and any necessary activities to avoid or minimize impacts have been coordinated with the Louisiana State Historic Preservation Officer (for questions, the operator should contact the Section 106 Review Coordinator, Office of Cultural Development, P. O. Box 44247, Baton Rouge, LA 70804 or telephone (225) 342-8170);
8. discharges of wastewater determined by this Office to present an environmental risk or potential risk of discharging pollutants other than is intended to be regulated by this permit;
9. discharges resulting from the decontamination of equipment involved in remediation type activities,
10. discharges associated with the disposal, storage, or treatment of hazardous (RCRA non-exempt) oilfield waste,

11. discharges of washwater from (a) the interior cleaning of tanks and vessels at oilfield service facilities, and from (b) vehicles with tanks or cargo compartments for the hauling or dispensing of pesticides, waste materials such as garbage or hazardous waste, or any chemical which is deemed by this Office to be a threat to the environment,
12. discharges of internal tank truck washing wastewater,
13. discharges at operations classed as new sources or new dischargers, if the discharge will cause or contribute to the violation of water quality standards (LAC 33:IX.2317.A.9); and
14. discharges which cause or contribute to the violation of a state water quality standard.

At the discretion of this Office, coverage under this general permit **may not** be available to discharges:

- 1) from facilities not in compliance with a previously issued individual or general wastewater discharge permit;
- 2) from facilities which have previously been in violation of state water quality regulations;
- 3) from facilities which are located in an environmentally sensitive area; or
- 4) from facilities which owe any outstanding fees or fines to the Department.

IV. DISCHARGE LOCATION (LAC 33:IX.6519.A.1)

Within the geographic boundaries of the State of Louisiana.

V. RECEIVING STREAM/USES (LAC 33:IX.6519.A.2)

A covered facility may discharge to or flow to any water body within the geographic boundaries of the State of Louisiana, as defined in LAC 33:IX.1123 and 2313.

The possible designated uses of the receiving streams are:

Primary Contact Recreation  
Secondary Contact Recreation  
Propagation of Fish and Wildlife  
Oyster Propagation  
Drinking Water Supply  
Agriculture  
Outstanding Natural Resource Waters  
Limited Aquatic Life and Wildlife Use

## VI. PROPOSED EFFLUENT LIMITATIONS AND/OR CONDITIONS

The specific effluent limitations and/or conditions will be found in the permit. Development of permit limits is detailed in the Permit Rationale section below.

## ~~VII. PERMIT RATIONALE (LAC 33:IX.3111.B.4, LAC 33:IX.3305.B.1.d)~~

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the permit. Because the facility types covered by this general permit and others with similar discharges had received individual permits for years prior to the issuance of the initial general permit for discharges from light commercial facilities, effluent limitations for the initial general permit were based on those previously applied in the individual permits. The proposed effluent limitations and/or conditions contained in this permit are a continuation of those implemented in the current LPDES General Permit for Discharges from Light Commercial Facilities (effective August 1, 2001); the LPDES General Permit for Hydrostatic Test Wastewater (effective March 1, 2003); the LPDES General Permits for Discharge of Sanitary Wastewater (Class I effective December 1, 2002; Class II effective March 1, 2003); the LPDES General Permit for Exterior Vehicle Wash Wastewater (effective March 15, 2004); the LPDES General Permit for Dewatering of Petroleum Storage Tanks, Tank Beds, New Tanks and Excavations (effective January 1, 2005); and individual LPDES permits recently issued by the Department.

### A. TECHNOLOGY-BASED VERSUS WATER QUALITY STANDARDS-BASED EFFLUENT LIMITATIONS AND CONDITIONS

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgment) in the absence of guidelines, or on a combination of the two. For the covered discharges, no effluent limitation guidelines have been promulgated so limitations are determined by BPJ.

In addition to the discharges regulated by the current version of the LPDES General Permit for Discharges from Light Commercial Facilities, this reissuance general permit will also regulate facilities which have sanitary wastewater discharges up to 25,000 gallons per day maximum expected flow. Sanitary wastewaters are regulated in accordance with LAC 33:IX.711 or 709.B and by BPJ utilizing the sanitary general permits issued by this Office. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD<sub>5</sub> and TSS in terms of concentration.

Frequently, EPA adopts nationally applicable guidelines identifying the BPT, BCT, and BAT standards to which specific industrial categories and subcategories are subject. Until such guidelines are published, however, CWA Section 402(a)(1) requires that appropriate BCT and BAT effluent limitations be determined using best professional judgment (BPJ). Since national guidelines establishing BPT, BCT, and BAT standards have not been promulgated for discharges covered by this general permit, the appropriate BCT and BAT limitations have been established based on BPJ, as required by CWA Section 402(a)(1) and LAC 33:IX.3705.

Discharges of storm water and wastewaters from minor industrial facilities classified as light commercial facilities are non-continuous in nature. The determination of flow from these outfalls is derived by estimate of the flow. Because of the intermittent or non-continuous nature of discharges that may be authorized under this general permit, the effluent limitations for discharges will be in terms of concentrations, as allowed by LAC 33:IX.2709.F.1 and 40 CFR 122.45.

**B. TECHNOLOGY-BASED EFFLUENT LIMITATIONS AND CONDITIONS**  
(LAC 33:IX.3111.B.4)

**1. GENERAL COMMENTS**

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgment) in the absence of guidelines, or on a combination of the two. Effluent guidelines have not been promulgated for the types of discharges that are covered by this permit, so limitations were determined based on BPJ and on previously issued permits for similar discharges.

Discharges that may be authorized under this general permit will be those wastewater or storm water discharges described in Part I (items 1-13) of this fact sheet. The permit is intended to cover only the specific types of discharges described in Part I, items 1-13 of this fact sheet.

Other than the following six changes, the permit limits and conditions are equivalent to those in the current LPDES General Permit for Discharges from Light Commercial Facilities (effective January 1, 2001); and are based on the LPDES General Permit for Hydrostatic Test Wastewater (effective March 1, 2003); LPDES General Permit for Potentially-Contaminated Storm Water, and/or Associated Wastewaters (effective January 1, 2001); LPDES General Permit for Exterior Vehicle Wash Wastewater (effective March 15, 2004); the LPDES General Permit for Dewatering of Petroleum Storage Tanks, Tank Beds, New Tanks and Excavations (effective January 1, 2005), and individual LPDES permits recently issued by the Department.

- a) The prior version of the permit (effective January 1, 2001) allows sanitary wastewater discharges up to 5,000 GPD. In order to increase the effectiveness and applicability of the general permit, the reissuance permit

will increase the allowable sanitary wastewater discharges to 25,000 GPD maximum expected flow. Based on our past experience in permitting discharges of sanitary wastewater, the effluent limitations and other conditions placed on sanitary wastewater discharges are adequate to ensure that water quality standards in receiving water bodies will not be compromised by increasing the allowable maximum daily discharge of sanitary wastewater to 25,000 GPD.

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- b) The prior version of the permit stipulates that sanitary wastewater "shall be monitored at the point of discharge from the treatment unit and prior to mixing with any other water." In order to increase the effectiveness and applicability of the general permit, the reissuance permit will remove that restriction and allow the permittee to monitor sanitary wastewater after it commingles with other regulated wastestreams and prior to mixing with other waters. Appendix A that will be attached to the permittees letter authorizing discharge under the general permit will identify the effluent schedule that applies to each wastewater constituent in the commingled wastestream. The permittee will be required to monitor the discharge consisting of commingled wastestreams in accordance with the monitoring requirements for each effluent schedule and for each wastewater constituent of the commingled wastestream. These monitoring requirements are adequate to ensure that water quality standards in receiving water bodies will not be compromised by allowing the permittee to monitor sanitary wastewater after it commingles with other regulated wastestreams and prior to mixing with other waters.
- c) Part II.Q of this permit requires that each permittee implement pollution prevention activities for specific activities when that activity occurs at the permitted facility. In accordance with the requirement of Part II.Q, although permitted facilities that discharge non-regulated storm water are not required to have a written storm water pollution prevention plan (SWPPP) they are required to implement pollution prevention activities. The permit stipulates that permitted facilities whose storm water discharges are regulated under the Multi-Sector General Permit (MSGP) must have a written site-specific SWPPP that satisfies the appropriate industrial sector-specific requirements for that particular facility.
- d) TMDL language was not included in the current version of the permit. The State Water Quality Standards section of the reissuance general permit includes TMDL information and the requirement that "should any TMDLs and wasteload allocations which address these discharges be developed, implementation within the required time frames for application of these requirements will be completed."



- e) Certain effluent schedules contained in the prior version of the permit required the permittee to report on the DMR the type and amount of soap and/or detergent used during the monitoring period and to submit a Material Safety Data Sheet (MSDS) for each material used. In accordance with recent individual LPDES permits issued by the Department, this permit requires the permittee to maintain a monthly inventory record. The permittee must document the quantity and type of soap and/or detergent that is used during each calendar month and keep a copy of the MSDS for that product with the monthly inventory record. The permittee is instructed to retain the inventory records on site along with the facility's copy of DMR records. The permittee is specifically instructed that it should not submit the inventory records or copies of the MSDS to LDEQ when it submits the DMRs for that effluent schedule.
- f) Alternate monitoring schedules have been included for most schedules in the permit which will require more frequent monitoring at facilities of concern, such as those with unsatisfactory compliance histories but which are otherwise eligible for coverage under the general permit. Increased monitoring frequencies will be available for discharges under every Schedule of the permit except for Schedule D (Hydrostatic Testing and Vessel Testing Wastewater), which requires that wastewater be monitored 1/discharge.
- g) Schedules F and G allow a maximum pH of 11 standard units for discharges of boiler water treatment blowdown and boiler blowdown wastewater from boilers that are used for climate control or similar circumstances. Such boilers would be used for climate control at office buildings, office parks, warehouses, and similar buildings. This condition is intended to allow permit coverage to a minimal number of facilities if a thorough review of the NOI and local environmental conditions result in a determination that the facility-specific discharge will not violate state water quality regulations.

The following two items were included in the permit to ensure that permittees are aware of related LPDES regulations and to facilitate compliance with those regulations.

- 1) The permit contains a synopsis of regulations related to construction activities that might occur at a permitted site and guidance for obtaining permit coverage for regulated construction activities.
- 2) The permit offers guidance and instructions related to modification of a facility's authorization to discharge and transfer of permit coverage when a permitted facility changes ownership.

## 2. LIMITED PARAMETERS AND MONITORING REQUIREMENTS:

The following schedules are referred to in the tables in this section of the fact sheet:

<b>Schedule A:</b>	Treated Sanitary Wastewater (less than 5,000 GPD)
<b>Schedule B:</b>	Exterior Vehicle and Equipment Washing; Equipment Repair Area Washdown; Shop Floor Area Washdown; Dock Washdown; and Utility Wash Water (all <u>with</u> Soaps and/or Detergents)
<b>Schedule C:</b>	Equipment Repair Area Washdown; Shop Floor Washdown; and Utility Wash Water (all <u>without</u> Soaps and/or Detergents)
<b>Schedule D:</b>	Hydrostatic Testing and Vessel Testing Wastewater
<b>Schedule E:</b>	Non-Contact Cooling Water (less than 100,000 GPD)
<b>Schedule F:</b>	Cooling Tower Blowdown (less than 25,000 GPD); and Boiler Water Treatment Blowdown
<b>Schedule G:</b>	Boiler Blowdown Wastewater
<b>Schedule H:</b>	Condensate
<b>Schedule I:</b>	MSGP regulated storm water discharges (not discussed in this section)
<b>Schedule J:</b>	Treated Sanitary Wastewater (5,000 to 25,000 GPD)

Discharges of sanitary wastewater are regulated in accordance with LAC 33:IX.711 or 709.B and by BPJ utilizing the sanitary general permits issued by this Office. LAC33:IX.2709.D requires that all permit effluent limitations for continuous discharges, including limitations necessary to achieve water quality standards, have daily maximum and monthly average (daily average) discharge limitations for all dischargers other than publicly owned treatment works. Discharges of treated sanitary wastewater from facilities eligible for coverage under this general permit will be low volume flow and non-continuous in nature. The current version of this permit contained monthly average and weekly average effluent limitations for discharges of treated sanitary wastewater. The monthly average and weekly average effluent limitations for discharges of sanitary wastewater will continue to be used in the reissuance permit because the discharge limitations used in the past have proven adequate to regulate the intermittent, low volume flow of treated sanitary wastewater from minor industrial facilities.

In order to more effectively regulate operations under the permit, provision is made for alternate monitoring schedules which will require more frequent monitoring at facilities of concern, such as those with unsatisfactory compliance histories but which are otherwise eligible for coverage under the general permit. The alternate monitoring frequencies are included as footnotes on the effluent schedule pages. Justification for application of the increased monitoring will be documented in the Statement of Basis which is completed for each facility authorized under the permit. Permittees will be notified in the coverage authorization letter if the increased monitoring frequency requirements are applicable.

Increased monitoring frequencies will be available for discharges under every Schedule of the permit except for Schedule D (Hydrostatic Testing and Vessel Testing Wastewater), which requires that wastewater be monitored 1/discharge.

The availability of an option for increased monitoring under the various schedules included in the general permit for discharges from light commercial facilities allows the Department to place more stringent requirements on minor facilities with de minimis discharges of concern, such as facilities with an unsatisfactory compliance history. The use of more stringent monitoring requirements in the general permit will give the Department more regulatory oversight over a limited number of facilities that discharge de minimis wastewaters and will allow the Department to devote more resources to issuing individual LPDES permits to industrial facilities with discharges that require more regulatory oversight.

PARAMETER: FLOW IN GPD	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	----	Report	1/6 months	Estimate
Schedule J	Report	Report	1/3 months	Estimate

The monitoring frequencies established in the permit for discharges of treated sanitary wastewater are consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current individual and general LPDES permits issued that contain effluent limitations for discharges of less than 25,000 GPD of treated sanitary wastewater. The determination of flow from these outfalls is derived by estimate of the flow.

PARAMETER: BOD <sub>5</sub>	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	----	45 mg/L	1/6 months	Grab
Schedule J	30 mg/L	45 mg/L	1/3 months	Grab

BOD<sub>5</sub> effluent limitations are established as Best Conventional Pollutant Control Technology (BCT) based on Best Professional Judgement; LAC 33:IX.711, LAC 33:IX.705, and LAC 33:IX.5905.A. A weekly average effluent limitation of 45 mg/L BOD<sub>5</sub> is included in this permit for discharges of treated sanitary wastewater. This effluent limitation of 45

mg/L was included as the weekly average limitation in the current LPDES Class I General Sanitary Permit (LAG530000) and the Class II General Sanitary Permit (LAG540000); previous individual and general permits issued by the Office of Environmental Services (formerly the Office of Water Resources). A monthly average effluent limitation of 30 mg/L is included in this permit for discharges of 5,000 GPD to 25,000 GPD of treated sanitary wastewater based on the current LPDES Class II General Permit for Discharges of Sanitary Wastewater (LAG540000). The monitoring frequencies established in the permit for BOD<sub>5</sub> are consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current LPDES general permits issued for discharges of less than 25,000 GPD of treated sanitary wastewater.

PARAMETER: TSS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	---	45 mg/L	1/6 months	Grab
Schedule J	30 mg/L	45 mg/L	1/3 months	Grab

TSS effluent limitations are established as Best Conventional Pollutant Control Technology (BCT) based on Best Professional Judgment; LAC 33:IX.711 and LAC 33:IX.5905.B. The TSS limitation of 45 mg/L weekly average (for sewage treatment plants) will be included in the permit based on LAC 33:IX.711 and LAC 33:IX.5905.B; and a TSS limitation of 135 mg/L weekly average (facilities that use oxidation ponds for treatment) in accordance with LAC 33:IX.5911; based on the current LPDES Class I General Sanitary Permit (LAG530000) and the Class II General Sanitary Permit (LAG540000), issued by the Office of Environmental Services (formerly the Office of Water Resources). A monthly average effluent limitation of 30 mg/L is included in this permit for discharges of 5,000 GPD to 25,000 GPD of treated sanitary wastewater based on the current LPDES Class II General Permit for Discharges of Sanitary Wastewater (LAG540000). The monitoring frequency established in the permit for TSS is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current LPDES general permits issued that contain effluent limitations for discharges of less than 25,000 GPD of treated sanitary wastewater.

PARAMETER: OIL & GREASE	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	---	15 mg/L	1/6 months	Grab

	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
Schedule J	10 mg/L	15 mg/L	1/3 months	Grab

Oil & Grease limitations are established on Best Conventional Pollutant Control Technology (BCT) based on Best Professional Judgment; LAC 33:IX.711, LAC 33:IX.705, and ~~LAC 33:IX.5905-A~~. The weekly average effluent limitations for Oil & Grease discharges from sanitary wastewater treatment plants included in this permit are consistent with the weekly average limitations in the current LPDES General Permit for Discharges from Light Commercial Facilities; the current LPDES Class I General Sanitary Permit (LAG530000), the LPDES Class II General Sanitary Permit (LAG540000). The monthly average effluent limitations established in Schedule J are consistent with the monthly average limitations established in the current LPDES Class II General Sanitary Permit (LAG540000). The monitoring frequency established in the permit for Oil & Grease is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current LPDES general permits issued for discharges of less than 25,000 GPD of treated sanitary wastewater.

PARAMETER: FECAL COLIFORM	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	---	400 colonies/ 100 ml	1/6 months	Grab
Schedule J	200 colonies/ 100. ml	400 colonies/ 100 ml	1/3 months	Grab

According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standard for water bodies which have a designated use of Primary Contact Recreation is 200/100 mL for at least five samples taken over not more than a 30-day period, nor shall more than 10 percent of the total samples during any 30-day period or 25 percent of the total samples collected annually exceed 400/100 mL. The primary contact recreation criteria apply only during the defined recreational period of May 1 through October 31. During the non-recreational period of November 1 through April 30, the criteria for secondary contact recreation shall apply. Based on a minimum of not less than five samples taken over not more than a 30-day period, the fecal coliform content for the secondary contact recreation designation shall not exceed a log mean of 1,000/100 mL, nor shall more than 10 percent of the total samples collected annually exceed 2,000/100 mL. Discharges of treated sanitary wastewater are intermittent, therefore, the weekly average limit of 400/100 mL is proposed as the fecal coliform limit in the permit. This limit is being proposed through Best Professional Judgment in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with this limitation using present available technology. The monitoring frequency established in the

permit for fecal coliform is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current individual and general LPDES permits issued that contain effluent limitations for discharges of less than 25,000 GPD of treated sanitary wastewater.

The BCT effluent limitations for fecal coliform which will be assigned to facilities located in areas which have oyster propagation as a designated use is a weekly average limitation of 43 fecal colonies/100 mL for flows of less than 5,000 GPD. The BCT effluent limitations for fecal coliform which will be assigned to facilities located in areas which have oyster propagation as a designated use is a weekly average limitation of 43 fecal colonies/100 mL and a monthly average limitation of 14 fecal colonies/100 mL, in accordance with LAC 33:IX.1113.C.5.b.iv, for flows of 5,000 to 25,000 GPD. If this more stringent fecal coliform limitation is required, the permittee will be informed in the letter that LDEQ sends to the permittee authorizing discharge under the general permit. These are also the fecal coliform effluent limitations for sanitary wastewater in the LPDES Class I and II Sanitary General Permits and individual permits issued by the Office of Environmental Services (formerly the Office of Water Resources).

PARAMETER: pH - Allowable Range in Standard Units	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule A	6.0 (Minimum)	9.0 (Maximum)	1/6 months	Grab
Schedule J	6.0 (Minimum)	9.0 (Maximum)	1/3 months	Grab

pH effluent limitations in the range of a minimum of 6.0 standard units to a maximum of 9.0 standard units is included in this permit, based on Best Professional Judgment; and LAC 33:IX.5905.C. This effluent limitation was included for discharges of treated sanitary wastewater in the current LPDES General Permit for Discharges from Light Commercial Facilities, as well as other LPDES general permits issued by this Office. This effluent limitation can also be found in the EPA Region VI Storm Water Guidance Document and in previous individual and general permits issued by the Office of Environmental Services (formerly the Office of Water Resources). The monitoring frequency established in the permit for pH is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, and current LPDES general permits issued for discharges of less than 25,000 GPD of treated sanitary wastewater.

PARAMETER: FLOW IN GPD	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE

	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
Schedule B	Report	Report	1/3 months	Estimate
Schedule C	Report	Report	1/3 months	Estimate
Schedule D	Report	Report	1/discharge event	Estimate
Schedule E	Report	Report	1/month	Estimate
Schedule F	Report	Report	1/month	Estimate
Schedule G	Report	Report	1/month	Estimate
Schedule H	Report	Report	1/month	Estimate

Discharges of storm water and wastewaters from light commercial facilities are non-continuous in nature. The determination of flow from these outfalls is derived by estimate of the flow. Because of the intermittent or non-continuous nature of discharges that may be authorized under this general permit, the effluent limitations for discharges (other than discharges of treated sanitary wastewater) will be in terms of monthly average and daily maximum concentrations, as allowed by LAC 33:IX.2709.F.1 and 40 CFR 122.45.

The monitoring frequencies established in the permit are consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, the LPDES General Permit for Hydrostatic Test Wastewater; the LPDES General Permit for Discharges Resulting from Implementing a Corrective Plan for Cleanup of Petroleum Underground Storage Tank Systems; the LPDES General Permit for Exterior Vehicle Wash Wastewater; and current individual and general LPDES permits issued that contain effluent limitations for discharges of process wastewater or storm water from minor industrial facilities.

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

PARAMETER: TSS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule B	----	45 mg/L	1/3 months	Grab
Schedule D	----	90 mg/L	Once prior to proposed discharge	Grab
Schedule G	30 mg/L	100 mg/L	1/month	Grab

Total Suspended Solids (TSS) - Best Conventional Pollutant Control Technology based on Best Professional Judgment (BPJ) and LAC 33:IX.705. The daily maximum effluent limitation of 45 mg/L has been assigned for discharges of exterior vehicle and/or equipment

washwater; equipment repair area washdown using soaps and/or detergents; shop floor washdown using soaps and/or detergents; dock washdown using soaps and/or detergents; utility wash water using soaps and/or detergents; and boiler blowdown wastewater. The daily maximum effluent limitation of 90 mg/L has been assigned for discharges of hydrostatic testing and vessel testing wastewater.

Schedule G contains the daily maximum effluent limitation of 100 mg/L and the monthly average effluent limitation of 30 mg/L for discharges of boiler blowdown wastewater which is consistent with the effluent limitations contained in the current LPDES General Permit for Discharges from Light Commercial Facilities. The proposed effluent limitation for TSS is derived from the BCT effluent limitations found in 40 CFR 423 - Steam Electric Power Generating Point Source Category for low volume wastewaters which include boiler blowdown discharges. The composition and treatability of this wastewater, whether at an electric power plant or at a light commercial facility with a small boiler, are similar. Therefore, this effluent limitation has been proposed as a traditional Best Conventional Pollutant Control Technology based on Best Professional Judgment and previously issued individual industrial permits.

There is no monthly average effluent limitation for TSS included in the permit for discharges in accordance with Schedule B and D based on the current LPDES General Permit for Discharges from Light Commercial Facilities, and current LPDES individual and general permits issued for similar discharges.

The monitoring frequency established in Schedules B, D, and G of the permit for TSS is consistent with the monitoring requirements contained in the current version of the General Permit for Discharges from Light Commercial Facilities, the LPDES General Permit for Hydrostatic Test Wastewater, the LPDES Exterior Vehicle Wash General Permit and current individual LPDES permits issued for similar types of discharges.

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

Footnote 3 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) states that the permit limitation will be 90 mg/L plus the concentration of TSS in the intake water if effluent is returned to the same water source from which it was obtained. The TSS concentration of the intake water shall be reported on the DMR along with the concentration of TSS in the effluent. When potable water is used for hydrostatic testing the effluent limit for TSS in the discharge shall be 90 mg/L.

PARAMETER:	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE



	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	200 mg/L	300 mg/L	1/3 months	Grab
Schedule B				

The monthly average COD shall be 200 mg/L and the daily maximum COD shall be 300 mg/L for discharges of exterior vehicle and/or equipment wash water; equipment repair area washdown; shop floor washdown; dock washdown; and/or utility wash water when soaps and/or detergents and used during the washing. If the exterior vehicle and/or equipment wash water; equipment repair area washdown; shop floor washdown; dock washdown; or utility wash water is combined with storm water, the COD limitation shall be 125 mg/L Daily Maximum. These effluent limitations were included as the daily maximum limitation in the current LPDES General Permit for Discharges from Automotive Repair and Maintenance Shops, Motorcycle Dealerships, and Recreational Vehicle Dealerships. These effluent limitations have also been used in the LPDES Light Commercial Facilities General Permit; the LPDES Exterior Vehicle Wash Wastewater General Permit; and in previous individual and in other general permits issued by the Office of Environmental Services for similar discharges.

The monitoring frequency established in Schedule B of the permit for COD is consistent with the monitoring requirements contained in the current version of the General Permit for Discharges from Light Commercial Facilities, the LPDES Exterior Vehicle Wash General Permit and current LPDES individual and general permits issued for similar discharges.

PARAMETER:	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule B	----	15 mg/L	1/3 months	Grab
Schedule C	----	15 mg/L	1/3 months	Grab
Schedule D	----	15 mg/L	Once prior to proposed discharge	Grab
Schedule G	----	15 mg/L	1/month	Grab

A daily maximum effluent limitation of 15 mg/L Oil and Grease is included in the permit for discharges of process wastewater and process area storm water as Best Conventional Pollutant Control Technology based on LAC 33:IX.705, Best Professional Judgment; the current LPDES General Permit for Light Commercial Facilities; the General Permit for Sand and Gravel Extraction Operations; LPDES Exterior Vehicle Wash General Permit; the LPDES General Permit Discharges of Hydrostatic Test Wastewater; other current LPDES General Permits; and current individual industrial permits.

The proposed effluent limitation in Schedule G for Oil and Grease is derived from the BCT effluent limitations found in 40 CFR 423 - Steam Electric Power Generating Point Source

Category for low volume wastewaters which include boiler blowdown discharges. The composition and treatability of this wastewater are similar to discharges from a large boiler found at a steam electric power plant. Therefore, this effluent limitation has been proposed as a traditional Best Conventional Pollutant Control Technology based on Best Professional Judgment and previously issued individual industrial permits.

The monitoring frequency established in Schedule B of the permit for COD is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, the LPDES Exterior Vehicle Wash General Permit and current individual LPDES permits issued that contain effluent limitations for Temperature (Freshwater).

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

PARAMETER: pH – Allowable Range in Standard Units	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule B	6.0 (Minimum)	9.0 (Maximum)	1/3 months	Grab
Schedule C	6.0 (Minimum)	9.0 (Maximum)	1/3 months	Grab
Schedule D	6.0 (Minimum)	9.0 (Maximum)	Once prior to proposed discharge	Grab
Schedule E	6.0 (Minimum)	9.0 (Maximum)	1/month	Grab
Schedule F	6.0 (Minimum)	9.0 (Maximum)	1/month	Grab
Schedule G	6.0 (Minimum)	9.0 (Maximum)	1/month	Grab

pH effluent limitation of 6.0 minimum to 9.0 maximum standard units will be included in this permit for all discharges of wastewater and storm water, based on Best Professional Judgment; and LAC 33:IX.705 and LAC 33:IX.5905.C. This effluent limitation was included in the current LPDES General Permit for Discharges from Light Commercial Facilities; the LPDES Hydrostatic Test Wastewater General Permit; the LPDES General Permit for Exterior Vehicle Wash Wastewater General Permit; and other current individual and general LPDES permits issued by this Office for similar discharges. This effluent limitation can also be found in the EPA Region VI Storm Water Guidance Document and in previous individual and general permits issued by the Office of Environmental Services (formerly the Office of Water Resources).

For discharges of boiler water treatment blowdown and boiler blowdown wastewater from office buildings and office parks the permit allows a maximum pH of 11 standard units provided that a review of the NOI and the local receiving stream conditions result in a

determination that a pH of 11 will not adversely impact the water quality of the receiving stream. The higher pH is allowed for these discharges because the low pressure boilers used at most light commercial facilities are designed to operate optimally at a pH near 11. According to Chapter 3 of the *Technical Reference and Training Manual* of the Association of Water Technologies pH must be controlled in the range of pH 9 to 11 to prevent corrosion. At a pH of 10 to 11 silica is rendered less volatile, magnesium will precipitate as the hydroxide, and calcium will form calcium carbonate. At pH 11.5 phosphate is efficient at precipitating calcium hardness, magnesium will precipitate as  $Mg(OH)_2$  and silica will be soluble as silica ion. Maintaining a high pH is standard treatment for discharges of boiler water treatment blowdown and boiler blowdown wastewater at office buildings, office parks, warehouses and similar facilities where the boiler is used for climate control purposes. Past history has established that discharges of boiler water treatment blowdown and boiler blowdown wastewater from office buildings and office parks have minimal impacts on the pH of receiving water bodies. Typically these are the only discharges from office buildings, office parks, warehouses, and similar buildings so there is no dilution from commingled wastestreams to lower the pH. The pH of the discharges from these buildings is lightly buffered and discharges typically are routed through local drainage systems rather than directly to a receiving water body which results in the pH of the low volume flow from such buildings being neutralized and having minimal impact on the receiving stream. Therefore, the permit allows a maximum pH of 11 standard units for discharges of boiler water treatment blowdown and boiler blowdown wastewater from office buildings, office parks, warehouses and similar buildings to alleviate the administrative costs associated with issuing individual permits for these discharges which have proven in the past to have insignificant impacts on receiving water bodies. Based on current knowledge of facility types and discharge types, the LDEQ knows of very few instances where this higher pH limit might be applicable and will fully evaluate the NOI and local environmental conditions prior to granting permit coverage to a facility that might be eligible for the higher pH limit. If a thorough review reveals that granting general permit coverage to a particular facility will violate state water quality standards then that facility will be granted coverage under the general permit with the stipulation that the permit limit for discharges of boiler water treatment blowdown and boiler blowdown wastewater from the facility is the standard 6.0 minimum pH and 9.0 maximum pH and that any regulated discharges from the facility that are not within that pH range will be a permit violation.

The monitoring frequency established in Schedule B of the permit for pH is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, the LPDES Exterior Vehicle Wash General Permit and current individual LPDES permits issued that contain effluent limitations for Temperature (Freshwater).

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

PARAMETER: Soaps and/or Detergents	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule B	N/A	N/A	1/3 months	Inventory calculation

Soaps and/or Detergents - This condition is being required for discharges of wastewater from washing activities that use soaps and/or detergents. Based on BPJ, this condition is being required for discharges of washrack, shop floor washdown, equipment repair area washdown, dock washdown and utility wash water. This condition was included to monitor similar types of discharges covered by the current LPDES Light Commercial Facilities General Permit; the LPDES General Permit for Discharges from Automotive Repair and Maintenance Shops, Motorcycle Dealerships, and Recreational Vehicle Dealerships; the LPDES Exterior Vehicle Wash Wastewater General Permit and in previous individual permits issued by the Office of Environmental Services (formerly the Office of Water Resources). The current version of this permit requires that the permittee submit to the permitting authority a Material Safety Data Sheet (MSDS) for each soap and/or detergent that was reported on the Discharge Monitoring Report as being used by the facility during the reporting period and to report the quantity of any soap and/or detergent used during the monitoring period. This permit no longer requires the permittee to submit copies of the MSDS to the permitting authority or to report on the quarterly DMR the amount of soap and/or detergent used during the monitoring period. The permitted facility will now be required to document in a monthly inventory record the quantity and type of any soap and/or detergent that is used at the facility during each calendar month. The inventory records and a MSDS for each material used shall be retained on site along with the facility's copy of DMR records.

The monitoring frequency established in Schedule B of the permit for Soaps and/or Detergents is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, the LPDES Exterior Vehicle Wash General Permit and current individual LPDES permits issued that require an inventory calculation for Soaps and/or Detergents.

PARAMETER: Visible Sheen	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule B	----	No Presence	1/day	Grab
Schedule H	No Presence	No Presence	1/month	Grab

Visible Sheen – Permitted facilities are required to make a visual observation at the frequency specified in each schedule and to record the presence or absence of a visible sheen. The total number of observations and the total number of exceedances shall be reported on a DMR annually. This condition is being required for discharges from the above referenced schedules based on best professional judgment. This condition was included in the current LPDES Light Commercial Facilities General Permit; the LPDES General Permit for Discharges from Automotive Repair and Maintenance Shops, Motorcycle Dealerships, and Recreational Vehicle Dealerships; the LPDES Exterior Vehicle Wash General Permit; and in current individual LPDES permits issued by the Office of Environmental Services for similar discharges.

The monitoring frequency established in Schedules B and H of the permit for Visible Sheen is consistent with the monitoring requirements contained in the current General Permit for Discharges from Light Commercial Facilities, the LPDES General Permit for Discharges from Automotive Repair and Maintenance Shops, Motorcycle Dealerships, and Recreational Vehicle Dealerships; the LPDES Exterior Vehicle Wash General Permit and current individual LPDES permits issued that require visual observations for Visible Sheen.

PARAMETER: TOC	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule C	----	50 mg/L	1/3 months	Grab
Schedule D	----	50 mg/L	Once prior to proposed discharge	Grab
Schedule E	----	5 mg/L (NET)	1/month	Grab

Daily maximum effluent limitations of 50 mg/L TOC shall be included in this general permit for discharges from Schedules C and D. A daily maximum effluent limitation of 5 mg/L (NET) is established for Schedule E. The total amount of organically bound carbon will be more clearly measured using TOC, which will be limited under Best Available Technology Economically Achievable based on Best Professional Judgment. This effluent limitation for TOC was assigned in the current LPDES General Permit for Discharges from Light Commercial Facilities. This effluent limitation can also be found in the EPA Region VI Storm Water Guidance Document; the LPDES General Permit for Dewatering of Petroleum

Storage Tanks, Tank Beds, New Tanks and Excavations; the LPDES General Permit for Discharges from Light Commercial Facilities; the LPDES Cement, Concrete and Asphalt Facilities General Permit; the LPDES General Permit for Discharges Resulting From Implementing Corrective Action Plans for Cleanup of Petroleum UST Systems in Louisiana, in recent individual permits issued by this Office; in the Final National Pollutant Discharge Elimination System Storm Water Multi-Sector General Permit for Industrial Activities, Federal Register, Friday, September 29, 1995; and LDEQ Storm Water Guidance letter from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region VI), dated June 17, 1987.

The monitoring frequency established in Schedules C, D and E of the permit for TOC is consistent with the monitoring requirements contained in the current LPDES General Permit for Discharges from Light Commercial Facilities; the LPDES General Permit for Hydrostatic Test Wastewater; the LPDES General Permit for Cement, Concrete and Asphalt Facilities; and recent individual LPDES permits issued that contain effluent limitations for TOC.

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

Footnote 4 of Schedule D states that TOC shall be measured on discharges from pipes, vessels, and/or tanks which have previously been in service. TOC measurement is not required for discharges of hydrostatic testing and vessel testing wastewater used to test new pipes, vessels, and/or tanks.

PARAMETER: Benzene	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule D	---	50 µg/L	Once prior to proposed discharge	Grab

**Benzene:** EPA documents cite a study that was performed for the Gas Research Institute (GRI) and is titled "Environmental Aspects of Hydrostatic Test Water Discharges: Operations, Characterization, Treatment and Disposal." The GRI study gathered data on benzene, BTEX, oil and grease, and TSS. This study illustrates that benzene can be a pollutant of particular concern in discharges from facilities which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons. Benzene is an appropriate BAT parameter representing the toxic hydrocarbons which may be present in discharges of hydrostatic test wastewater. Therefore, the permit contains a limitation, based on BAT, for benzene. Based on the above mentioned study, the current LPDES General Permit for Discharges from Light Commercial Facilities, and the LPDES

Hydrostatic Test Wastewater General Permit, the permit contains a daily maximum concentration of 50 µg/L benzene. When analytical test results report a Benzene concentration of less than 10 µg/L, that result may be reported as zero on the Discharge Monitoring Report (DMR) form that is submitted to the LDEQ Office of Environmental Compliance.

~~The monitoring frequency established in Schedule D of the permit for Benzene is consistent with the monitoring requirements contained in the current LPDES General Permit for Discharges from Light Commercial Facilities, the LPDES General Permit for Hydrostatic Test Wastewater; and current individual LPDES permits issued that contain effluent limitations for Benzene.~~

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

Footnote 4 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) states that Benzene shall be measured on discharges from pipes, vessels, and/or tanks which have previously been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

PARAMETER: Total BTEX	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule D	----	250 µg/L	Once prior to proposed discharge	Grab

Total BTEX: BTEX components such as toluene and xylenes may be present in water contaminated by liquid or gaseous petroleum hydrocarbons. EPA documents cite a study that was performed for the Gas Research Institute (GRI) and is titled "Environmental Aspects of Hydrostatic Test Water Discharges: Operations, Characterization, Treatment and Disposal." The data in the GRI study illustrate that BTEX can be a pollutant of particular concern from hydrocarbons stored in storage tanks. The BTEX parameter is determined to be an appropriate indicator parameter for other hydrocarbon fuel components which might be discharged in hydrostatic wastewater, during the testing of pipes, vessels, and/or tanks that have contained or been used in the past for the storage of hydrocarbons. Because of the highly variable composition of petroleum hydrocarbon fuels, for some products any one of the four BTEX constituents can be the predominant constituent; therefore, application of this aggregate parameter is appropriate.

A Daily maximum BAT effluent limitation of 250 µg/L has been established in this general permit for Total BTEX. This limitation is well below the total of the human health drinking

water criteria for benzene, ethylbenzene, and toluene, the BTEX constituents for which standards are established in LAC 33:IX.1113. The other constituent, xylene, is not expected to be present in amounts which might significantly affect the totals. This pollutant is of concern mainly in aviation fuels, which will constitute at most only a small number of the total discharges this permit will authorize. The proposed effluent limitation of 250 µg/L for Total BTEX is the same as that used in the current LPDES General Permit for Discharges from Light Commercial Facilities and the LPDES General Permit for Discharges of Hydrostatic Test Wastewater.

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

Footnote 4 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) states that Total BTEX shall be measured on discharges from pipes, vessels, and/or tanks which have previously been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

Footnote 5 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) states that Total BTEX shall be measured as the sum of benzene, toluene, ethylbenzene, ortho-xylene, meta-xylene, and para-xylene as quantified by EPA methods 602, 624, 1624. This requirement is consistent with other current LPDES General Permits for Hydrostatic Test Wastewater; Implementing Corrective Action Plans for Cleanup of Petroleum Underground Storage Tank Systems; and Discharges of Treated Groundwater, Potentially Contaminated Storm Water, and/or Associated Wastewaters.

PARAMETER: Lead	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule D	---	50 µg/L	Once prior to proposed discharge	Grab

**Total Lead:** An effluent limitation for lead is included in this general permit for discharges of hydrostatic testing and vessel testing wastewater that are generated at light commercial facilities. Further, this Office has found through its permitting experience with the LPDES General Permit for Discharges Resulting From Implementing Corrective Action Plans for Cleanup of Petroleum UST Systems in Louisiana that lead is a useful parameter, in conjunction with Total BTEX, for the regulation of hydrocarbons from hydrostatic testing activities. A lead BAT effluent limitation of 50 µg/L is therefore established. This effluent



limitation is also utilized in the LPDES General Permit for Discharges Resulting from the Dewatering of Petroleum Storage Tanks, Tank Beds, New Tanks and Excavations related to the surface cleanup of spills or leaks resulting from the handling of petroleum; the current LPDES General Permit for Discharges from Light Commercial Facilities; the LPDES General Permit for Potentially Contaminated Storm Water, and/or Associated Wastewater; and the LPDES General Permit for Discharge of Hydrostatic Test Wastewater.

Footnote 1 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) of the permit requires increasing the monitoring frequency to once/week when a discharge event extends beyond one week in duration.

Footnote 4 of Schedule D (Discharges of Hydrostatic Testing and Vessel Testing Wastewater) states that Lead shall be measured on discharges from pipes, vessels, and/or tanks which have previously been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

PARAMETER: Temperature (Freshwater)	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule E	---	Report	1/month	Grab
Schedule F	---	Report	1/month	Grab
Schedule G	---	Report	1/month	Grab

Temperature (Freshwater, Estuarine and Coastal Waters) - The temperature requirements in the permit are based on the temperature criterion listed in LAC 33:IX.1113.C.4 of the water quality standards. At light commercial facilities, the discharge of non-contact cooling water, cooling tower blowdown, boiler water treatment blowdown, and boiler blowdown wastewater will typically be of low volume as compared to large industrial facilities such as steam electric power plants and is not considered a significant pollutant to waters of the state at these volumes. However, due to the future development of TMDLs and wasteload allocations for various water bodies, temperature is being included in the permit as "Report" in order to obtain the information needed for this work. This reporting requirement is based on Best Professional Judgment, LAC 33:IX.1113.C.4, and previously issued individual industrial permits. The monitoring frequency established in the permit for Temperature (Freshwater) is consistent with the monitoring requirements contained in the current LPDES General Permit for Discharges from Light Commercial Facilities, and current individual LPDES permits issued that require reporting Temperature (Freshwater).

PARAMETER: Temperature (Estuarine & Coastal Waters)	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule E	----	Report	1/month	Grab
Schedule F	----	Report	1/month	Grab
Schedule G	----	Report	1/month	Grab

Temperature (Freshwater, Estuarine and Coastal Waters) - The temperature requirements in the permit are based on the temperature criterion listed in LAC 33:IX.1113.C.4 of the water quality standards. At light commercial facilities, the discharge of non-contact cooling water, cooling tower blowdown, boiler water treatment blowdown, and boiler blowdown wastewater will typically be of low volume as compared to large industrial facilities such as steam electric power plants and is not considered a significant pollutant to water of the state at these volumes. However, due to the future development of TMDLs and wasteload allocations for various water bodies, temperature is being included in the permit as "Report" in order to obtain the information needed for this work. This reporting requirement is based on Best Professional Judgment, LAC 33:IX.1113.C.4, and previously issued individual industrial permits. The monitoring frequency established in the permit for Temperature (Estuarine & Coastal Waters) is consistent with the monitoring requirements contained in the current LPDES General Permit for Discharges from Light Commercial Facilities, and current individual LPDES permits that require reporting Temperature (Estuarine & Coastal Waters).

PARAMETER: Total Residual Chlorine (TRC) (NET)	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Schedule E	----	0.2 mg/L	1/month	Grab
Schedule F	----	0.2 mg/L	1/month	Grab

The TRC daily maximum limitation of 0.2 mg/L has been established based on best professional judgment, effluent limitations in the current LPDES General Permit for Discharges from Light Commercial Facilities; the effluent guidelines promulgated in 40 CFR 423 for Steam Electric Power Generating Point Source Category, and previously issued individual industrial permits. The monitoring frequency established in the permit for TRC is consistent with the monitoring requirements contained in the current LPDES General Permit for Discharges from Light Commercial Facilities, and current individual LPDES permits that contain effluent limitations for TRC.

### C. MONITORING FREQUENCIES FOR LIMITED PARAMETERS

Regulations require permits to establish monitoring requirements to yield data representative of the monitored activity (LAC 33:IX.2715/40 CFR 122.48(b)) and to assure compliance with permit limitations (LAC 33:IX.2707.I.1/40 CFR 122.44(l)(1)).

~~The monitoring frequencies assigned to each parameter in the permit appear in the~~ applicable table in VII.B above and are equivalent to the monitoring frequencies used in existing LPDES general permits and in individual LPDES permits issued by this Office for similar type of discharges. Schedules A, B, C, E, F, G, H, and J of the permit allow the Department to establish more stringent monitoring frequencies for discharges from minor facilities whose discharges are otherwise eligible for coverage under the general permit but may require more regulatory oversight than the majority of facilities that are authorized to discharge under the general permit. An example of a facility that might require more regulatory oversight is a facility with an unsatisfactory compliance history. The use of more stringent monitoring requirements in the general permit will allow the Department more regulatory oversight over certain facilities covered by the general permit while allowing the Department to devote more resources to issuing individual LPDES permits to industrial facilities with discharges that consistently require more regulatory oversight.

### D. REQUIREMENTS FOR REGULATED STORM WATER DISCHARGES

This condition is continued unchanged from the 2001 LAG480000 general permit.

For those facilities with storm water discharges associated with industrial activity as defined in LAC 33:IX.2511.B.14.a-i and k, coverage by the Louisiana Pollutant Discharge Elimination System Multi-Sector General Permit (MSGP) will be automatic and effective upon authorization under the Light Commercial General Permit. Those facilities will submit all reports required by the permit under their Light Commercial Facilities General Permit authorization number, LAG48XXXX. Permittees shall comply with all applicable requirements set forth in the MSGP which is in effect at the time of authorization by means of the LPDES General Permit for Discharges from Light Commercial Facilities.

The following sections of the 2001 MSGP are not applicable to permittees with storm water permit coverage granted automatically upon authorization to discharge under the LPDES General Permit for Discharges from Light Commercial Facilities.

Part 1.3.2	(NOI submittal)
Part 1.4	(Terminating Coverage)
Part 2	(NOI Requirements)
Part 11.1	(Transfer of Permit Coverage)
Part 11.2 and 11.3	(NOT)

Facilities whose storm water discharges are not currently authorized by the MSGP and whose storm water permit coverage is granted automatically upon authorization to discharge under the LPDES General Permit for Discharges from Light Commercial Facilities shall prepare the storm water pollution prevention plan (SWPPP) as required by the MSGP within 60 days after authorization under the Light Commercial Facilities General Permit (rather than prior to submittal of the MSGP NOI as the MSGP states). Those operators with current coverage under the MSGP shall continue to follow the plan already in effect. However, when the facility receives their LAG48XXX-authorization number that automatically authorizes discharges under the MSGP, the facility shall submit a NOT to terminate their facility-specific MSGP permit authorization number.

Operators who can certify that they are eligible for the industrial storm water No Exposure Exclusion may be removed from coverage by the MSGP as provided in Parts 1.5 and 11.4 of the 2001 MSGP.

Oil and Gas Extraction Operations (SIC codes 1311, 1321, 1381-1389, and 2911) do not require MSGP coverage if they have not had a Reportable Quantity Release at the facility since November 16, 1987. However, they could later require MSGP coverage if a new Reportable Quantity release as defined in 40 CFR 110 occurs at the facility. After learning of the release, these operations must submit an NOI (form MSGP-G) for MSGP coverage within 14 calendar days and must prepare and implement the SWPPP as required in Part 4 of the MSGP within 60 calendar days. During this interim period while the SWPPP is being prepared and implemented, the operation shall take all appropriate measures to limit the discharge of pollutants in the facility's storm water runoff. The MSGP-G form is available on the LDEQ website at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/msgp-g.doc>.

A copy of the applicable provisions of the MSGP, based upon the facility's reported primary SIC code, will be provided with the permittee's written authorization letter under LAG480000. In addition, in accordance with with 2001 MSGP Part 1.2.1.2 "Co-located Activities", compliance with sector requirements for "co-located industrial activities on-site" is also required. The permittee shall be responsible for conducting an evaluation of facility activities and shall apply all appropriate sector requirements if it is determined that co-located activities occur on-site. See Part II.S of this permit for a complete Sector/SIC code list of coverage for the 2001 MSGP. A copy of the complete 2001 MSGP may be obtained by contacting the LDEQ Water and Waste Permits Division at (225) 219-3181; the permit is also available on the LDEQ website at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/msgp-g.doc>.

#### VIII. PUBLIC NOTICES (LAC 33:IX.3111.B.6)

The public notice describes the procedures for the formulation of final determinations.

Upon publication of the public notice, a public comment period shall begin on the date of

publication and last for at least 30 days thereafter. During this period, any interested person may submit written comments on the permit. Any interested person may also submit a written request for clarification of issues related to the content of the general permit or the permit issuance process. Interested persons may also submit written requests for notification of the final permit decision or to request a public hearing to clarify issues involved in the permit decision. A request for a public hearing shall state the nature of the issues proposed to be raised in the hearing. The public notice specifies that written comments and/or written requests shall be submitted to the LDEQ Public Participation Group and that written comments and/or written requests must be received by the Department by a specific deadline.

Public notice will be published in:

THE ADVOCATE of Baton Rouge  
LAKE CHARLES AMERICAN PRESS  
THE ADVERTISER of Lafayette  
THE TIMES of Shreveport  
THE TIMES PICAYUNE of New Orleans  
THE NEWS-STAR of Monroe  
THE TOWN TALK of Alexandria  
THE COURIER of Houma

LDEQ Permits Public Notice Mailing List

LDEQ                  Permits                  Public                  Web                  Page                  at  
<http://www3.deq.louisiana.gov/news/pubnotice/default.asp>.

In addition to the public notice procedures described above, a notice will be placed in *The Advocate* that identifies this permit as well as other permits placed on public notice for the previous week for facilities located in the following hurricane impacted parishes: Cameron, Orleans, St. Bernard, St. Tammany, Jefferson, Terrebonne, Calcasieu, and Plaquemines. The notices will clearly identify the electronic web link to view the public notices and will provide a telephone number to call to request additional information or to find out where documents may be reviewed locally.

Additional precautions will be taken to assure that people who live in the parishes most severely impacted by recent hurricanes receive notice of the draft permit. The following additional public notice procedures will apply to public notice of the draft permit in Cameron, Orleans, and St. Bernard parishes:

1. Comment periods will be extended a total of fifteen (15) extra days.
2. Notices will be published twice in the selected newspaper(s).
3. The public notice will also be published in an additional newspaper in a parish that physically adjoins each of the three parishes. This additional public notice will be published in the newspaper with the largest circulation in

a parish that physically adjoins Cameron Parish, Orleans Parish, and St. Bernard Parish.

The draft permit, NOI, and fact sheet will be available for review at the LDEQ Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, Louisiana, during the hours of 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays).

The Water and Waste Permits Division will send notification of the final permit decision to each person who has submitted written comments or a written request for notification of the final decision.

#### IX. ENDANGERED SPECIES ACT

The proposed limitations on these discharges are sufficiently stringent to assure state water quality standards, both aquatic life and human health protection, will be met for any receiving stream throughout the state. The effluent limitations established in this permit mirror those found in the current permit that was issued on July 31, 2001. Prior to its issuance, the current permit was approved by the United States Fish and Wildlife Service (USFWS). The effluent limitations in this reissuance permit ensure protection of aquatic life and maintenance of the receiving water as an aquatic habitat. Correspondence from the USFWS dated October 21, 2005, states that the Service has determined that general permit LAG480000 contains effluent limitations that are protective of aquatic life and will ensure that water bodies that receive discharges that are in compliance with the permit will be protected as a sustainable aquatic habitat; therefore the Service has determined that no coordination is required for facilities that submit an NOI for initial coverage under the general permit. Regulated storm water discharges from facilities covered under this general permit must comply with the appropriate LPDES storm water general permit(s). The storm water general permits require the applicant to comply with the Endangered Species Guidance provided in the permits which will allow the USFWS the opportunity to consider both the impacts of a project prior to initiating construction related activities and the post-construction impacts in order to avoid unauthorized impacts upon listed species or the critical habitat for those species.

The USFWS issued a letter of no objection for the issuance of the current LPDES LAG480000 permit that expires July 31, 2006. The state finds that adoption of the reissuance permit is unlikely to have unauthorized adverse effects upon threatened or endangered species or on the critical habitat for these species. In a letter from the USFWS that was received by LDEQ on September 12, 2005, the USFWS concurred with the state's determination.

#### X. NATIONAL HISTORIC PRESERVATION ACT

~~As set forth in the National Pollutant Discharge Elimination System Memorandum of Agreement between the LDEQ and the United States Environmental Protection Agency (U.S. EPA), LDEQ will require that applicants consult with the Louisiana State Historic Preservation Officer in accordance with Section 106 of the National Historic Preservation Act.~~ The NOI clearly states that applicants for permit coverage under this general permit are required to contact the Louisiana State Historic Preservation Officer concerning proposed excavation activities at the site/facility prior to applying for permit coverage. The state finds that adoption of the permit is unlikely to have unauthorized adverse effects upon properties listed or eligible for listing in the National Register of Historic Places provided that proposed facilities coordinate with the State Historic Preservation Officer to avoid or minimize impacts from construction related activities. The preliminary draft permit and fact sheet have been submitted to the State Historic Preservation Office for their comments and/or concurrence with the state's determination.

#### XI. FEES

At the time of proposed issuance, the annual maintenance and surveillance fee for coverage under this permit will be \$345.00. A twenty percent surcharge (up to a maximum surcharge of \$150.00) will be added to the annual fee (total maximum of \$414.00) of all facilities located in the following basins: Atchafalaya River, Barataria, Lake Pontchartrain, Mississippi River, and Terrebonne. Monies collected through this surcharge are deposited in the Oyster Sanitation Fund, which is used to support molluscan sanitation efforts. The agency may adjust fee amounts at a later date by promulgation in the Louisiana Administrative Code.

#### XII. SCHEDULE OF COMPLIANCE

The permittee is to be in compliance with the permit limitations and conditions as of the date of coverage under the general permit. An "Appendix A" will be used in the issuance of the permit. Appendix A will assign outfall numbers to the discharge points at each facility, state which set of effluent limitations and monitoring requirements should be followed for each outfall, and define industrial storm water coverage if applicable.

#### XIII. STATE WATER QUALITY STANDARDS

The permit requires as an eligibility condition that covered discharges not cause or have the reasonable potential to cause or contribute to a violation of a state water quality standard. If a discharge is known to be doing such the operator must seek coverage under

an alternative permit. Where a discharger is already operating under the permit and is later discovered to cause or have the reasonable potential to cause or contribute to the violation of a state water quality standard, the permitting authority will notify the operator of such violation(s) and the permittee shall take all necessary actions to ensure future discharges do not cause or contribute to the violation of a water quality standard and document these actions in the pollution prevention plan. If violations remain or recur then coverage under the permit will be terminated after alternate coverage is obtained. ~~Compliance with this requirement does not preclude any enforcement activity as provided~~ by the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.) for the underlying violation. A permit reopener clause is included in the permit.

Where an approved or established TMDL has not specified a wasteload allocation applicable to discharges covered by this general permit, but has not specifically excluded these discharges, it will generally be assumed that discharges from facilities permitted under this general permit are consistent with approved TMDLs. In order to meet the assumptions and requirements of established or approved TMDLs, coverage under this general permit may be denied and regulation under an individual permit required. Facilities that discharge to a specific 303(d) listed impaired water body will not be eligible for coverage under this general permit if the TMDL for that particular water body specifically precludes discharges covered by this general permit, or where the discharge can be expected to cause or contribute to the water quality impairment addressed by the TMDL.

The general criteria and numerical criteria which make up the stream standards are provided in the "Louisiana Surface Water Quality Standards", (LAC 33:IX.11, amended as of September 1989, March 1991, April 1994, August 1994, July 1995, November 1996, and October 1998, October 2000).

For the purposes of assuring that state water quality standards are achieved, the following language is being included in the general permit (PART II, SECTION G) along with a reopener clause (PART II, SECTION N).

LAC 33:IX.1113 describes numerical and general criteria that apply to all water bodies of the State. Criteria are elements of the water quality which set limitations on the permissible amounts of a substance or other characteristics of state waters. The General Criteria, as described in the Louisiana Administrative Code, limit discharges to maintain aesthetics, color, turbidity, the biologic and aquatic community integrity, and many other elements in the receiving water body. Any noncompliance with the General or Numerical Criteria is not authorized under this permit.

To comply with the requirements of LAC 33:IX.2317.A.9, this permit does not authorize a discharge from an operation which is classed as a new source or new discharge, as defined at LAC 33:IX.2313, if the discharge will cause or contribute to the violation of water quality standards. Discharges from facilities permitted under LPDES general permits



typically consist of low volume flows, and discharges that are intermittent in nature. This general permit is applicable to very specific types of discharges that specifically occur at minor industrial facilities that are eligible for coverage under this permit. The permit effluent limitations and other conditions are determined to be sufficient to assure protection to state waters. New source discharges or new discharges of wastewater from a facility whose discharges are in compliance with the general permit requirements should not adversely impact water quality of 303(d) listed impaired water bodies nor should they cause or contribute to the violation of state water quality standards in receiving water bodies throughout the state, including 303(d) impaired water bodies. Authorizing facility-specific permit coverage under this general permit will not negatively impact the water quality of receiving streams because permitted discharges are required to be in compliance with the general permit requirements immediately upon coverage by the permit. In accordance with Part II.F, II.H.1, and II.N measures can be taken by the permitting authority to prohibit any discharge that is not protective of state water quality standards.

Discharges of wastewater and/or industrial storm water from minor industrial facilities that are eligible for general permit coverage are relatively small flows with short term duration. The experience which this Office has in permitting these discharges, and the absence of any quantifiable degradation to the receiving water bodies for discharges under previously-issued general permits, support the adequacy of continuing the previously applied conditions and effluent limitations to assure that water quality standards will be met, as supported in the following discussion and above in Part VII of this Fact Sheet.

The permit duplicates the parameters, limitations, and requirements found in the LPDES General Permit for Discharges from Light Commercial Facilities, effective August 1, 2001, except for the changes described above in Part VII.B.1.a-f.

EPA Region VI concurred that the effluent limitations established in the August 1, 2001 permit ensured attainment of water quality standards. The state does not believe any water quality issues have developed that were not considered when the 2001 permit was prepared; therefore, that determination is still valid and those limitations continue to be used in the permit.

The parameters and limits contained in the permit will offer adequate protection to any streams listed on the LDEQ Section 303(d) List of Impaired Water Bodies. DO impacted streams will be adequately protected by the TOC limitation of 50 mg/L on hydrostatic testing and vessel testing wastewater; the 5 mg/L (NET) TOC limit on non-contact cooling water; the 300 mg/L COD limit on wash water discharges; the 125 mg/l limit on discharges of combined exterior vehicle, equipment and utility wash water and dock and shop wash down wastewater and storm water; and the 45 mg/l BOD<sub>5</sub> limit on discharges of treated sanitary wastewater.

#### XIV. FINAL DETERMINATION

The availability of an LPDES General Permit for Discharges from Light Commercial Facilities streamlines the permit process for certain minor industrial facilities that generate common types of incidental, low-potential wastewaters, which allows the Department to devote more resources to issuing individual LPDES permits to industrial facilities with discharges that require more regulatory oversight.

*This agency has determined that discharges covered by this authorization are de minimis in volume and nature and thus do not pose any reasonable potential to cause or contribute to any existing water quality or 303(d) listed impairment.*

The effluent limitations and monitoring requirements of this permit are adequate to protect for the designated uses and water quality standards of Louisiana.

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue the permit for the discharges described above in Parts I and III.